

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LOUNNA MARCIUS,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION FILE
)	NO. 1:14-cv-02967
)	
RJM Acquisitions, LLC,)	
)	
Defendant.)	

JOINT CONSENT MOTION TO OPEN DEFAULT

COME NOW RJM Acquisitions, LLC (hereinafter “RJM” or “Defendant”) and Plaintiff Lounna Marcius (hereinafter “Plaintiff”), by and through undersigned counsel, and hereby submit this Joint Consent Motion to Open Default and request that this Honorable Court enter the proposed Order attached hereto as Exhibit “A” and deem Defendant RJM Acquisitions, LLC’s Answer and Affirmative Defenses (Doc. 2) timely.

Respectfully submitted this ____ day of November, 2014.

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Brantley C. Rowlen -----

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/s/ Lounna Marcus-----
Lounna Marcus

Pro se Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I this day have electronically filed this Joint Consent Motion to Open Default with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following:

Lounna Marcius
833 Langley View Ct
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lounnam@yahoo.com

This ____ day of November, 2014.

/s/ Brantley C. Rowlen
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Attorney for Defendant
RJC Acquisitions, LLC

CERTIFICATE OF FONT

Pursuant to N.D. Ga. Local Rules 5.1(B) and 7.1(D), I hereby certify that this document is submitted in Times New Roman 13 point type.

/s/ Brantley C. Rowlen

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